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**Hearing Date: October 3, 2019
at 10:00 A.M.**

Related to Doc. Nos. 5266, 5272, 5273

Counsel to EPI Printers, Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Chapter 11

SEARS HOLDINGS CORPORATION, *et al.*,

Case No. 18-23538 (RDD)

Debtors.¹

(Jointly Administered)

**JOINDER OF EPI PRINTERS, INC. TO THE SUPPLEMENTAL OBJECTION OF
MIEN CO. LTD., HELEN ANDREWS, STRONG PROGRESS GARMENT FACTORY
COMPANY, LTD, SAMIL SOLUTIONS, SHANGHAI FOCHIER, PURCELL MURRAY,
A&A HK INDUSTRIAL, MINGLE FASHION, MANSHEEN INDUSTRIES, LTD., AMW
VIETNAM CO. LTD., AUXO INTERNATIONAL LTD., HOLDSUN GROUP LTD,
BEAUTY GEM, INC. TO CONFIRMATION OF THE MODIFIED SECOND AMENDED
JOINT CHAPTER 11 PLAN OF SEARS HOLDING CORPORATION AND ITS
AFFILIATED DEBTORS AND TO TERMINATE EXCLUSIVITY**

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC (5554); Sears STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816); The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

**TO: THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE**

EPI Printers, Inc. (“EPI”) submits this joinder to the *Supplemental Objection of Mien Co. Ltd., Helen Andrews, Strong Progress Garment Factory Company, Ltd, Samil Solutions, Shanghai Fochier, Purcell Murray, A&A HK Industrial, Mingle Fashion, Mansheen Industries, Ltd, AMW Vietnam Co. Ltd, Auxo International Ltd., Holdsun Group Ltd, Beauty Gem, Inc. to Confirmation of the Modified Second Amended Joint Chapter 11 Plan of Sears Holding Corporation and Its Affiliated Debtors and to Terminate Exclusivity* [ECF No. 5266] (the “Supplemental Objection”) which objects to confirmation of the *Modified Second Amended Joint Chapter 11 Plan of Sears Holdings Corporation and its Affiliated Debtors* [ECF No. 4476] (the “Plan”). EPI holds a claim entitled to administrative priority under 11 U.S.C. § 503(b)(9) and a claim for other unpaid administrative expenses that have accrued in this bankruptcy case. However, the Debtors have not shown these claims will be paid in full as required for confirmation, and EPI has not agreed to any other treatment. Thus, EPI submits this joinder to the Objection, incorporating its arguments and authorities by reference. The Court should not confirm the Plan.

Dated: Detroit, Michigan.
October 1, 2019

Respectfully submitted,

MILLER, CANFIELD, PADDOCK AND
STONE, P.L.C.

By: /s/ Ronald A. Spinner

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Chapter 11

SEARS HOLDINGS CORPORATION, *et al.*,

Case No. 18-23538 (RDD)

Debtors.¹

(Jointly Administered)

CERTIFICATE OF SERVICE

The undersigned certifies that on October 1, 2019, he caused true and complete copies of the *Joinder of EPI Printers, Inc. to the Supplemental Objection of Mien Co. Ltd., Helen Andrews, Strong Progress Garment Factory Company, Ltd, Samil Solutions, Shanghai Fochier, Purcell Murray, A&A HK Industrial, Mingle Fashion, Mansheen Industries, Ltd, AMW Vietnam Co. Ltd, Auxo International Ltd., Holdsun Group Ltd, Beauty Gem, Inc. to Confirmation of the Modified Second Amended Joint Chapter 11 Plan of Sears Holding Corporation and Its Affiliated Debtors and to Terminate Exclusivity* to be served upon each of the parties listed below via pre-paid properly addressed U.S. mail:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Sears Holdings Corporation (0798); Kmart Holding Corporation (3116); Kmart Operations LLC (6546); Sears Operations LLC (4331); Sears, Roebuck and Co. (0680); ServiceLive Inc. (6774); SHC Licensed Business LLC (3718); A&E LLC (0204); FBA Holdings Inc. (6537); Innovel Solutions, Inc. (7180); Kmart Corporation (9500); MaxServ, Inc. (7626); & Business Franchises, Inc. (6742); Sears Home Improvement Products, Inc. (8591); Sears Insurance Services, L.L.C. (7182); Sears Procurement Services, Inc. (2859); Sears Protection Company (1250); Sears Protection Company (PR) Inc. (4861); Sears Roebuck Acceptance Corp. (0535); Sears, Roebuck de Puerto Rico, Inc. (3626); SYW Relay LLC (1870); Wally Labs LLC (None); SHC Promotions LLC (9626); Big Beaver of Florida Development, LLC (None); California Builder Appliances, Inc. (6327); Florida Builder Appliances, Inc. (9133); KBL Holding Inc. (1295); KLC, Inc. (0839); Kmart of Michigan, Inc. (1696); Kmart of Washington LLC (8898); Kmart Stores of Illinois LLC (8897); Kmart Stores of Texas LLC (8915); MyGofer LLC (5531); Sears Brands Business Unit Corporation (4658); Sears Holdings Publishing Company, LLC (5554); Sears STI Merchandising, Inc. (0188); Troy Coolidge No. 13, LLC (None); BlueLight.com, Inc. (7034); Sears Brands, L.L.C. (4664); Sears Buying Services, Inc. (6533); Kmart.com LLC (9022); Sears Brands Management Corporation (5365); and SRe Holding Corporation (4816); The location of the Debtors' corporate headquarters is 3333 Beverly Road, Hoffman Estates, Illinois 60179.

The Honorable Robert D. Drain
United States Bankruptcy Judge
United States Bankruptcy Court, S.D.N.Y.
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Date: October 1, 2019